

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK

KEVIN HUGHES, DIANE GOSIER, and  
DAVID MANNING, on behalf of themselves  
and all others similarly situated,

Plaintiffs,

-against-

GETRONICS WANG LLC; GETRONICS USA,  
INC.; and GETRONICS FLEXIBLE SOLUTIONS,  
LLC;

Defendants.

07-CV-10356 (LAK) (THK)

**DECLARATION OF MARIANN MEIER WANG**

I, MARIANN MEIER WANG, an attorney duly admitted to practice in the Southern District of New York, declare under penalty of perjury based on personal knowledge:

1. I am a partner at Emery Celli Brinckerhoff & Abady LLP (“ECBA”). ECBA is a fifteen-lawyer firm located in mid-town Manhattan which specializes in civil rights litigation. Our civil rights cases include constitutional claims under Section 1983, police misconduct and prisoners’ rights claims, unlawful takings, First Amendment and Equal Protection violations, fair housing violations, employment discrimination, wage and hour claims, and disability rights.

2. I received my A.B. from Harvard College in 1990 and my J.D. degree from Columbia University School of Law in 1996, where I was a James Kent Scholar for outstanding academic performance, received the Jane Marks Murphy Prize for excellence in clinical offerings and promise of a public interest career, and was on the *Human Rights Law Review*.

3. From August 1996 to August 1997 I served as a law clerk to the Honorable Sterling Johnson, Jr., in the Eastern District of New York. I was a litigation associate at the law firm Paul Weiss Rifkind Wharton & Garrison in New York from 1997 to 1999.

4. For approximately two years after I left Paul Weiss, I was employed as an attorney with the American Civil Liberties Union (“ACLU”) Reproductive Freedom Project, where I litigated all aspects of constitutional and other challenges to laws restricting reproductive rights and access to reproductive health care in federal and state courts throughout the country. For the next two years, I served as the Director of the Equality and Freedom of Expression Programs at Interights, The International Centre for the Legal Protection of Human Rights in London, England.

5. I joined ECBA as an associate in June 2003 and became partner in January 2006. My work at the firm includes investigating, instituting, managing, and litigating civil rights and commercial cases, including class actions and individual claims.

6. ECBA routinely represents plaintiffs in employment matters, including wage and hour matters, on a contingency basis.

7. Our standard contingency agreement requires clients to pay one third of their gross recovery as attorneys’ fees.

8. I am personally aware of fee arrangements between other new York City firms and their clients in employment cases, including wage and hour cases. All other New York City firms of which I am aware charge their clients at least one third of their gross recoveries when they represent them on a contingency basis.

Dated: February 1, 2010  
New York, New York

/s/Mariann Meier Wang  
Mariann Meier Wang